

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES BRETT, BUILDING
INSPECTOR OF TOWN OF HAMILTON,

Plaintiff,

v.

IRINA V. TEMKINA,

Defendant.

No. CV-05-11542-RGS

PROPOSED DISCOVERY SCHEDULE

Defendant submits the following Proposed Discovery Schedule. Items which differ from Plaintiff's proposal are marked with a *.

1. Defendant shall serve and file her Rule 26(a)(1) initial disclosures by March 31, 2006. *
2. Non-expert discovery, excluding depositions, shall be completed by September 30, 2006. *
3. All depositions pursuant shall be conducted by November 15, 2006. *
3. Expert disclosure, including identification of all expert witnesses and any and all written reports prepared by such expert witnesses, shall be made by Plaintiff by September 30, 2006, and by Defendant by October 15, 2006. *
4. Expert Depositions: Each party, at its discretion, shall be entitled to conduct no more than one (1) Deposition of each expert witness disclosed. All expert depositions shall be conducted no later than November 15, 2006. *
5. Motions for Summary Judgment pursuant to Rule 56 shall be filed no later than December 20, 2006. *
6. Pre-trial conference to be scheduled by the Court.

This Schedule may be amended at the consent of all parties, or upon Motion and Order of the Court in accordance with L.R. 16.1(G).

THE DEFENDANT,




Irina V. Temkina
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Gloucester, MA 01930
(860) 597-3020 telephone
temkinai@yahoo.com electronic mail

Dated: February 23, 2006

CERTIFICATE OF SERVICE

I, Irina V. Temkina, certify that the above Proposed Discovery Schedule was served on Donna Brewer MacKenna, counsel of record for the plaintiff, on February 23, 2006, via first class mail, postage prepaid.



Irina V. Temkina